

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	BKRTCY. NO. 15-04065 MCF
FELIX ANGEL FALCON FIGUEROA	*	CHAPTER 13
MYRNA JURADO RODRIGUEZ	*	
<u>DEBTORS</u>		

**DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

**TO THE HONORABLE COURT:**

**COME NOW, FELIX ANGEL FALCON FIGUEROA and MYRNA JURADO  
RODRIGUEZ**, the Debtors in the above captioned case, through the undersigned attorney,  
and very respectfully state and pray as follows:

1. The Debtors are hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated November 10, 2017, herewith and attached to this motion.

2. The Debtors are filing the present Plan modification in order to delete the provision for payment in full (100% plus 4.25% interest) to the general secured creditors under the "Other Provisions" of the proposed modified Plan, and pursuant to the Chapter 13 Trustee's unfavorable recommendation (Docket No. 43) of Debtors' previous proposed post-confirmation Plan modification (Docket No. 41).

**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)**

**Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

Page -2-  
Post Confirmation Modification 11 USC 1329  
Case no. 15-04065 MCF13

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; to the United States Trustee's Office; and to all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the Debtors, Felix Angel Falcon Figueroa and Myrna Jurado Rodriguez, HC 04 Buzon 8009 Aguas Buenas PR 00703; and to all creditors and interested parties (Non CM/ECF participants) appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 10<sup>th</sup> day of November, 2017.

/s/Roberto Figueroa Carrasquillo  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX 787-746-5294  
Email: rfigueroa@rfclawpr.com



United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 3:15-bk-4065

FALCON FIGUEROA, FELIX ANGEL & JURADO RODRIGUEZ, MYRNA

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 11/10/2017 <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION		<input type="checkbox"/> AMENDED PLAN DATED: _____ Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																																																	
<b>I. PAYMENT PLAN SCHEDULE</b>  <table style="width:100%;"> <tr> <td>\$ 200.00 x 27 = \$</td> <td>5,400.00</td> </tr> <tr> <td>\$ 0.00 x 2 = \$</td> <td>0.00</td> </tr> <tr> <td>\$ 200.00 x 7 = \$</td> <td>1,400.00</td> </tr> <tr> <td>\$ 1,068.00 x 24 = \$</td> <td>25,632.00</td> </tr> <tr> <td>\$ x = \$</td> <td></td> </tr> <tr> <td colspan="2" style="text-align: right;">TOTAL: \$ 32,432.00</td> </tr> </table> Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: _____  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____		\$ 200.00 x 27 = \$	5,400.00	\$ 0.00 x 2 = \$	0.00	\$ 200.00 x 7 = \$	1,400.00	\$ 1,068.00 x 24 = \$	25,632.00	\$ x = \$		TOTAL: \$ 32,432.00		<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: <table style="width:100%;"> <tr> <td>Cr. Scotiabank De PR</td> <td>Cr. Scotiabank de PR</td> <td>Cr. _____</td> </tr> <tr> <td># Claim 5-1</td> <td># Post-Pet</td> <td># _____</td> </tr> <tr> <td>\$ 728.64</td> <td>\$ 2,173.50</td> <td>\$ _____</td> </tr> </table> 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>Scotiabank De PR</b> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 2. Unsecured Claims otherwise receive PRO-RATA disbursements.		Cr. Scotiabank De PR	Cr. Scotiabank de PR	Cr. _____	# Claim 5-1	# Post-Pet	# _____	\$ 728.64	\$ 2,173.50	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____
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<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,705.00		<b>OTHER PROVISIONS:</b> (Exemptory contracts; payment of interest to unsecureds, etc.) * Debtors consent to the LIFT of STAY in favor of secured creditor Midfirst Bank (POC 4-1). Trustee will not make disbursements to secured creditor Midfirst Bank (POC 4-1). * Due to the extraordinary expenses incurred by the Debtors due to the passage of hurricane Maria through PR, the Debtors are including three (3) post-petition mortgage loan payments through the Plan (Sept-Nov/2017) the Debtors will commence making direct post-petition payments to Scotiabank PR in December/2017. * Additional Attorneys fees: \$500.00 for the services rendered in connection to Debtors' post-confirmation Plan and related procedures for approval, pursuant to Rule 2016(f)(3).																																																	
Signed: /s/ FELIX ANGEL FALCON FIGUEROA Debtor   /s/ MYRNA JURADO RODRIGUEZ Joint Debtor																																																			

Attorney for Debtor R Figueroa Carrasquillo Law Office PSC

Phone: (787) 744-7699

Label Matrix for local noticing  
0104-3  
Case 15-04065-MCF13  
District of Puerto Rico  
Old San Juan  
Thu Nov 9 13:48:27 AST 2017

MIDFIRST BANK  
999 NW GRAND BLVD  
OKLAHOMA CITY, OK 73118-6051

SCOTIABANK DE PUERTO RICO  
MARTINEZ & TORRES LAW OFFICES, P.S.C  
P.O. BOX 192938  
SAN JUAN, PR 00919-3409

SCOTIABANK OF PUERTO RICO  
MARTINEZ & TORRES LAW OFFICES, P.S.C.  
PO BOX 192938  
SAN JUAN, PR 00919-3409

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

American InfoSource LP as agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

Capital One Bank (USA), N.A.  
PO Box 71083  
Charlotte, NC 28272-1083

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

First Bank De Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

First Bank Of Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

MIDFIRST BANK  
ATTY JUAN B SOTO  
1353 LUIS VIGOREAUX AVE  
PMB 270  
GUAYNABO PR 00966-2715

MONEY EXPRESS  
CONSUMER SERVICE CENTER  
BANKRUPTCY DIVISION (CODE 248)  
PO BOX 9146  
SAN JUAN PR 00908-0146

Midland Mtg/Midfirst  
999 Nw Grand Blvd  
Oklahoma City, OK 73118-6051

Money Express  
PO Box 11890  
San Juan, PR 00922-1890

Municipio Autonomo De Caguas  
PO Box 907  
Caguas, PR 00726-0907

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

SCOTIABANK  
ATTY PATRICIA VARELA  
PO BOX 192938  
SAN JUAN PR 00919-3409

Scotiabank De Puerto Rico  
290 Jesus T Pinero Ave  
Hato Rey, PR 00919

Scotiabank Of Puerto Rico  
Martinez & Torres Law Offices, P.S.C  
PO.BOX 192838  
SAN JUAN, PR 00919-2838

Syncb/Walmart  
PO Box 965024  
Orlando, FL 32896-5024

Synchrony Bank  
PO Box 960061  
Orlando, FL 32896-0061

(p)T MOBILE  
C O AMERICAN INFOSOURCE LP  
4515 N SANTA FE AVE  
OKLAHOMA CITY OK 73118-7901

TD Bank N.A.  
Attn: Bankruptcy Dept.  
ME2-002-035  
P.O. Box 9547  
Portland, ME 04112-9547

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

FELIX ANGEL FALCON FIGUEROA  
HC 04 BUZON 8009  
AGUAS BUENAS, PR 00703-8802

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

MYRNA JURADO RODRIGUEZ  
HC 04 BUZON 8009  
AGUAS BUENAS, PR 00703-8802

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 186  
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank Usa N  
15000 Capital One Dr  
Richmond, VA 23238

Portfolio Recovery Associates, LLC  
POB 12914  
Norfolk VA 23541

T-mobile  
12920 Se 38th Street  
Bellevue, WA 98006

End of Label Matrix  
Mailable recipients 27  
Bypassed recipients 0  
Total 27